Exhibit C

Exhibit 264: Redacted

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UNITED STATES DISTRICT COURT
  SOUTHERN DISTRICT OF NEW YORK
SHABTAI SCOTT SHATSKY,
                          ) Case No. 18-Civ. 12355
individually and as
personal representative
of the Estate of Keren
                          ) VIRTUAL VIDEOTAPED
Shatsky, J ANNE
                          ) DEPOSITION OF FEDA
SHATSKY, individually
                          ) ABDELHADY-NASSER
and as personal
representative of the
Estate of Keren
Shatsky, TZIPPORA
SHATSKY SCHWARZ, YOSEPH
SHATSKY, SARA SHATSKY
TZIMMERMAN, MIRIAM
SHATSKY, DAVID RAPHAEL
SHATSKY, GINETTE LANDO
THALER, individually
and as personal
representative of the
Estate of Rachel
Thaler, LEOR THALER,
ZVI THALER, ISAAC
THALER, HILLEL
TRATTNER, RONIT
TRATTNER, ARON S.
TRATTNER, SHELLEY
TRATTNER, EFRAT
TRATTNER, HADASSA
DINER, YAEL HILLMAN,
STEVEN BRAUN, CHANA
FRIEDMAN, ILAN
FRIEDMAN, MIRIAM
FRIEDMAN, YEHIEL
FRIEDMAN, ZVI FRIEDMAN,
and BELLA FRIEDMAN,
       Plaintiffs,
       against
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1	
2	THE PALESTINE LIBERATION ORGANIZATION
3	and THE PALESTINIAN AUTHORITY (a/k/a "The
4	Palestinian Interim Self-Government
5	Authority" and/or "The Palestinian National
6	Authority"),
7	Defendants.
8	berendanes.
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1	VIRTUAL VIDEOTAPED DEPOSITION OF FEDA
2	ABDELHADY-NASSER, witness herein, called by the
3	Plaintiffs, for examination, taken pursuant to
4	the Federal Rules of Civil Procedure, by and
5	before Karen A. Nickel, a Certified Realtime
6	Reporter and a notary public in and for the
7	Commonwealth of Pennsylvania, held remotely
8	with all parties appearing from their
9	respective locations, on Thursday, July 22,
10	2021, at 9:30 a.m.
11	COUNSEL PRESENT:
12	
13	For the Plaintiffs: Ronald F. Wick, Esq. (Admitted Pro Hac Vice) Cohen & Gresser, LLP
14	2001 Pennsylvania Avenue, NW Suite 300
15	Washington, DC 20006
16	Stephen M. Sinaiko, Esq. Cohen & Gresser, LLP
17	800 Third Avenue New York, NY 10022
18	For the Defendants:
19	Mitchell R. Berger, Esq. Joseph Alonzo, Esq.
20	Salim Kaddoura, Esq. Squire Patton Boggs
21	2550 M Street NW
22	Washington, DC 20037
23	Also Present: Cosette Vincent Eszter Vincze
24	
25	

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5	By Mr. Sinaiko 7	
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PROCEEDINGS 1 2 THE VIDEOGRAPHER: Good 3 morning, everyone. We are now on the record. 4 Participants should be aware that this 5 proceeding is being recorded and, as such, all conversations held will be recorded unless 6 7 there is a request and agreement to go off the record. 8 This is the remote video-recorded 9 deposition of Feda Abdelhady-Nasser. 10 Today is 11 Thursday, July 22, 2021. The time is now 13:33 12 UTC. 13 We are here in the matter of Shatsky 14 versus PLO. My name is Corey Wainaina, remote 15 video technician on behalf of US Legal Support 16 located at 90 Broad Street, New York, New York. 17 I am not related to any party in this action, 18 nor am I financially interested in the outcome. 19 At this time, will the reporter, 20 Karen Nickel, on behalf of US Legal Support, 21 please enter the statement for remote 22 proceedings into the record. 23 THE REPORTER: The attorneys 2.4 participating in this deposition acknowledge that I am not physically present in the 25

1	deposition room and that I will be reporting
2	this deposition remotely.
3	They further acknowledge that, in
4	lieu of an oath administered in person, the
5	witness will verbally declare her testimony in
6	this matter is under penalty of perjury.
7	The parties and their counsel
8	consent to this arrangement and waive any
9	objections to this manner of reporting. Please
10	indicate your agreement by stating your name
11	and your agreement on the record.
12	MR. SINAIKO: Steve Sinaiko, on
13	behalf of the Plaintiffs, from Cohen & Gresser
14	in New York City, we agree.
15	MR. BERGER: Mitchell Berger,
16	Squire Patton Boggs, Washington, D.C., on
17	behalf of Defendants, we agree.
18	(Discussion held off the
19	record.)
20	THE VIDEOGRAPHER: We are
21	back on the record. The time is 13:36 UTC
22	time.
23	FEDA ABDELHADY-NASSER, a witness
24	herein, having been first duly sworn, was
25	examined and testified as follows:

1 EXAMINATION BY MR. SINAIKO: 2 Good morning, Ms. Abdelhady-Nasser. 3 0. 4 A. Good morning. 5 MR. BERGER: Excuse me, Steve. It would be appropriate and courteous for you 6 to refer to the witness as Ambassador. 7 MR. SINAIKO: Okay. Before we 8 get started, I have one housekeeping measure 9 10 for us to go over. 11 Since we are here remotely due to 12 the COVID-19 pandemic, we would ask that the 13 Defendant confirm that, pursuant to Rule 14 30(b)(4) of the Federal Rules of Civil 15 Procedure, today's deposition may be taken by 16 video conference. 17 THE WITNESS: Yeah. 18 MR. BERGER: Yeah, we confirm 19 that. 20 MR. SINAIKO: Good. And pursuant to Rule 29 of the Federal Rules of 21 Civil Procedure, I also want to confirm that 22 23 the parties are stipulating that Ms. Nickel is 2.4 an appropriate officer before whom to take the deposition even though she, I believe, is in 25

Pittsburgh, and I'm not actually sure where the 1 2 witness is but I'm pretty sure that she is not in Pennsylvania. 3 Can we agree, pursuant to Rule 29, 4 5 that Ms. Nickel is an appropriate officer before whom the deposition may be taken? 6 7 MR. BERGER: Yes, so stipulated. 8 9 MR. SINAIKO: Great. Okay. BY MR. SINAIKO: 10 11 Good morning. Thank you for being Q. 12 here today. My name is Steve Sinaiko. I am 13 with the law firm of Cohen & Gresser, LLP, in 14 New York City, and I represent the Plaintiffs in this lawsuit. 15 16 Have you had your deposition taken 17 previously? 18 A. No, I have not. 19 Q. Okay. Let me go over a couple of 20 ground rules for the process so that things go 21 smoothly and we are all on the same page. 22 Will that be okay? That's fine. 23 A. Yes. 24 I'm going to be asking you a series Q. of questions today, and your responses to those 25

questions will be sworn under oath and under 1 penalty of perjury. 2 Do you understand? 3 A. 4 Yes. 5 0. The court reporter is going to be transcribing everything we say today, so to 6 make sure that we have an accurate and clear record, and especially because the deposition 8 is taking place by video conference in light of 9 the COVID-19 pandemic, it is important that we 10 not speak over each other and that only one 11 12 person speaks at a time. 13 So I would ask that you wait until I 14 finish my questions before you start answering 15 And I, for my part, will try to wait them. 16 until you finish your answers before I ask 17 another question. 18 Will that be all right? 19 A. Yes. 20 It's also important for you to 21 respond to my questions verbally rather than by 22 nodding your head or moving your hand or 23 whatever, rather than by a non-verbal response, 2.4 because only verbal responses can be transcribed. 25

Do you understand? 1 A. Understood. 2 Okay. If you don't understand a 3 Q. question that I have asked you during our time 4 5 today, just let me know and I will try to rephrase the question or otherwise help to move 6 7 past whatever misunderstanding might exist. However, the Court will assume, and 8 all of the lawyers in the room will assume, 9 10 that you heard and understood every question 11 that you respond to. 12 Do you understand? 13 A. Yeah. 14 At times, Mr. Berger, your lawyer, Q. 15 may object to one of my questions, but unless 16 he instructs you not to answer a question, you 17 should go ahead and answer my question even 18 though there was an objection. 19 Do you understand? 20 Α. Yes. 21 From time to time, I will probably 22 take breaks during the deposition. If you need 23 a break, just let your attorney know or let me 2.4 know and I will do my best to accommodate your 25 request. But I do ask that if a question is

pending, if I've asked you a question and you 1 2 have not yet answered it, that you answer my question before we take a break. 3 4 Is that okay? 5 A. Yes. MR. BERGER: That may be okay 6 7 with the witness but, of course, consistent with the local rules, if we have an issue of 8 privilege, we are entitled to take a break and 9 10 discuss whether there is an appropriate 11 privilege objection. 12 MR. SINAIKO: Of course. 13 That's the only exception. 14 BY MR. SINATKO: 15 0. Okay. Within the last 72 hours, 16 have you ingested any substance that would 17 impair your ability to understand and respond 18 to questions? 19 Α. No. 20 Are you currently under the 21 influence of any such substance? 22 A. No. 23 Q. Is there any reason that you can 2.4 think of, as we sit here now, that you would not be able to give your -- let me withdraw 25

that. 1 Is there any reason, as you sit here 2 today, you can think of as to why you would not 3 be able to give your best testimony today? 4 Α. 5 No. Now, as we go through the questions, 6 0. I will be referring at times to the Defendants. When I refer to the Defendants, that is 8 intended by me, and I hope will be understood 9 10 by you, to encompass both the Palestinian 11 Authority and the Palestine Liberation 12 Organization. 13 Do you understand? 14 Α. Yes. 15 0. And at times, I may refer to the 16 Palestinian Authority as just the PA. Will 17 that be all right? 18 Α. Yes. 19 Q. Thank you. And at times, I will refer to the 20 21 Palestine Liberation Organization as PLO. 22 that be all right? 23 A. Yes. 2.4 And then, there will be times when I Q. refer to the Permanent Observer Mission of the 25

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State of Palestine to the United Nations, and I
 1
        will just refer to that as the Observer
 2
                  Will that be okay?
 3
        Mission.
             A.
 4
                   Yes.
                   Just to save time. It's a mouthful.
 5
             0.
                   Okay. Can we put up Tab No. 1,
 6
 7
                 I would ask the court reporter to mark
        please.
        this as Exhibit 1.
 8
 9
                         (Deposition Exhibit No. 1 was
10
        marked for identification.)
11
                         THE VIDEOGRAPHER:
                                              Mr.
        Sinaiko, for the video record, do you want to
12
13
        see the witness and the document or just the
14
        witness?
15
                         MR. SINAIKO: I would like to
16
        see the witness and the document. That will be
17
        fine.
18
                         THE VIDEOGRAPHER:
                                              Okay.
19
        Thank you.
        BY MR. SINAIKO:
20
21
                   Ambassador Abdelhady-Nasser, have
22
        you seen this document previously?
23
             A.
                   Yes.
2.4
                   And what -- when did you see this
             Q.
        document?
25
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A. My lawyer showed it to me yesterday. 1 2 Okay. And was that the first time Q. 3 you saw it? A. 4 Yes. 5 Q. What do you understand this document to be? 6 7 MR. BERGER: If you have an understanding. 8 THE WITNESS: 9 I understand 10 that this is the basis of the deposition or requiring my deposition. 11 BY MR. SINAIKO: 12 All right. You understand that this 13 14 is a notice for your deposition today; correct? 15 A. Correct. 16 And do you understand -- is it your Q. understanding that you are testifying today 17 pursuant to this notice? 18 19 A. Yes. And let me ask you, did you do 20 21 anything, in advance of today, to prepare for 22 your deposition? 23 A. I met with my lawyer. 2.4 Apart from meeting with your lawyer, Q. did you do anything else to prepare for your 25

deposition today? 1 I reviewed my calendar of 2 activities. 3 And did you review any documents 4 0. other than your calendar of activities? 5 I reviewed the deposition of my 6 7 Senior Ambassador Mansour. So you looked at the transcript of 8 Q. Dr. Mansour's testimony; is that correct? 9 10 Correct. A. 11 Q. And did you look at any documents, apart from your calendar and the transcript of 12 13 Dr. Mansour's deposition, in advance of your 14 testimony today? 15 A. No. 16 Apart from looking at the documents Q. 17 we just described and meeting with your lawyer, 18 did you do anything else to prepare for your 19 deposition today? 20 A. I tried to go to sleep early. 21 Probably a good idea. 0. Anything 22 apart from that? It didn't work. 23 A. No. 2.4 Okay. And in advance of your -- in Q. advance of your deposition today, did you have 25

any conversations with Mr. Mansour --1 withdrawn. 2 In advance of your deposition today, 3 did you have any conversations with Dr. Mansour 4 5 about your testimony that you would be giving today? 6 Only that I would have to give a 8 deposition on July 22nd. And when did you say that to 9 0. Dr. Mansour? 10 11 A. When I was informed by one of my 12 lawyers, Joseph Alonzo, that my deposition was 13 set for the 22d of July, so that I could inform 14 him that I would not be on duty that day. 15 0. All right. And apart from telling 16 Dr. Mansour that you would be testifying here 17 today on -- you know, today, July 22nd, did you 18 say anything else to Dr. Mansour or did Dr. Mansour say anything else to you during 19 20 this conversation concerning your deposition or 21 his? 22 A. He just wished me luck. 23 Q. Fair enough. Okey-doke. 2.4 Now, you said some time ago that, in addition to looking at documents, in addition 25

to speaking with -- speaking, albeit briefly, 1 2 with Dr. Mansour, you also met with your When you say you met with your lawyer, 3 4 who are you referring to? 5 A. I am referring to Mitch Berger and a phone call with Joseph Alonzo, or two phone 6 7 calls with Joseph Alonzo, for arranging times for the deposition. 8 So with respect to Mr. Alonzo, did 9 0. 10 you have any substantive conversations with him 11 concerning your deposition apart from a 12 conversation for scheduling? 13 He was with me in the last session 14 with Mr. Berger. 15 0. Got it. Okay. And when was the 16 first time you had a substantive conversation, and I'm not -- I don't want to get into the 17 18 substance of the conversations, I just want to 19 know when was the first time you had a 20 substantive conversation with Mr. Berger and/or 21 Mr. Alonzo about your testimony here today? 22 A. About two weeks ago. 23 Q. And how many times would you say, 2.4 over the last two weeks, you met with Mr. 25 Berger or Mr. Alonzo to discuss your testimony

1	here today?
2	A. Including the first meeting, three
3	times.
4	Q. Three times?
5	A. Including today.
6	Q. Oh, got it. Okay.
7	A. Four times including today.
8	Q. Okay. So there were three meetings
9	over the last two weeks to discuss your
10	testimony here today; correct?
11	A. Uh-huh. Yes.
12	Q. And the first meeting you say
13	happened, approximately, two weeks ago?
14	A. Yes.
15	Q. Do you have the date of that
16	meeting?
17	A. I have it in my calendar. I don't
18	know the exact date right now.
19	Q. And what was the duration of that
20	meeting?
21	A. It was about two hours.
22	Q. And were and both Mr. Berger and
23	Mr. Alonzo participated in that meeting?
24	A. No. Just Mr. Berger.
25	Q. And during this two-hour meeting

with Mr. Berger about two weeks ago, did 1 Mr. Berger show you any documents? 2 No. We just reviewed my calendar. 3 A. Okay. So did you have the calendar 4 0. 5 in front of you while you were there? I had a printed version of my 6 7 calendar with me. Were there any other documents that 8 0. you reviewed with Mr. Berger during this 9 10 initial meeting about two weeks ago? 11 A. No. 12 0. And after this initial meeting about 13 two weeks ago with Mr. Berger, when was the 14 next time you met with one or both of 15 Mr. Berger and Mr. Alonzo to discuss your 16 deposition today? 17 A. On Tuesday, July the 20th. 18 Q. And on Tuesday, July the 20th, how 19 long -- did you meet with them or was that a 20 telephone call? 21 It was a virtual meeting with 22 Mr. Berger. 23 Q. Mr. Berger only? 2.4 Α. Yes. And during that meeting, did 25 Q.

Mr. Berger show you any documents? 1 We discussed the same documents 2 that we had previously discussed, that I had 3 electronic versions of. 4 5 0. Just your calendar? Α. Correct. 6 And that's the calendar that was 7 Q. produced in discovery, you understand that to 8 be the case? 9 A. 10 Yes. 11 Q. And after this meeting on the 20th, when was the next time -- I guess the next time 12 13 would have been yesterday; is that right? 14 Α. Correct. 15 0. And who participated in that 16 meeting? 17 A. Mr. Berger and Mr. Alonzo. What was the duration of that 18 Q. 19 meeting? About an hour. 20 Α. 21 And the meeting on Tuesday, what was 22 the duration of that one? About two and a half hours. 23 A. 2.4 Got it. And the meeting, during the Q. meeting yesterday, or the virtual meeting 25

yesterday with Mr. Berger and Mr. Alonzo, did 1 you review any documents with them? 2 A. The Notice of Deposition and the 3 calendars. 4 5 0. Okay. And no other documents; those are the only ones? 6 Α. Yes. That is correct. Ambassador Abdelhady-Nasser, have 0. 8 you ever testified, before today, in any 9 deposition or court proceeding of any kind? 10 11 A. No, I have not. 12 Q. Are you a citizen of the United States? 13 14 Α. Yes, I am. 15 0. Are you a natural born citizen? 16 Yes, I am. A. And where do you currently reside? 17 Q. 18 A. I reside in New Jersey. 19 And the residence that you currently Q. 20 have in New Jersey, has that been your 21 residence at all times on and after January 4th 22 of 2020? Yes, it has. 23 A. 2.4 Have you had any other residences, Q. apart from the one in New Jersey, at any time 25

on or after January 4th of 2020? 1 I have visited other residences. 2 But not -- places where you resided, 3 0. that's all I'm talking about. 4 5 Α. Yeah. I live in New Jersey, in Ridgefield, New Jersey. 6 7 Okey-doke. Convenient. Q. MR. SINAIKO: If we could take down 8 this document and put up Tab 4, which I would 9 10 like to mark as Exhibit 2. 11 (Deposition Exhibit No. 2 was marked for identification.) 12 13 BY MR. SINAIKO: 14 Now, by the way, if at any time, 0. 15 Ambassador Abdelhady-Nasser, you would like to 16 look at any other part of this document or any document that we show you, just ask and I can 17 18 arrange for Cosette to turn the pages in 19 whatever way would be helpful to you. Is that 20 all right? 21 A. Yes. 22 0. Great. This document that we just 23 put in front of you and marked as Deposition 2.4 Exhibit No. 2, do you recognize that? 25 A. Yes, I do.

What do you recognize that document 1 Q. to be? 2 It is my LinkedIn profile. 3 A. And turning to the second page of 4 Q. 5 the document, it says here that you received a Bachelor's degree from New York University, in 6 7 1992, in political science and international relations. 8 Is that correct? 9 Yes, that is correct. 10 A. 11 And above that, it says that you Q. 12 received a Master of Arts degree from Rutgers 13 University in 2000 in the area of educational 14 leadership and administration; is that correct? 15 A. Yes. That is correct. 16 Q. And --17 MR. BERGER: Just for a clear 18 record, Steve, the actual question you asked is whether that's on the page. I assume you want 19 to confirm --20 21 MR. SINAIKO: I was just 22 getting to that. Sorry for talking over you, 23 I do understand that and I was actually 2.4 going to come right back to it. I apologize. 25 MR. BERGER:

1	MR. SINAIKO: No apologies
2	needed. I appreciate the assistance.
3	BY MR. SINAIKO:
4	Q. Now that we have established what's
5	on the page, are those two entries on your
6	LinkedIn profile accurate? Did you receive the
7	degree from New York University and the degree
8	from Rutgers that are reflected on Page 2 of
9	your LinkedIn profile?
10	A. Yes, I did.
11	MR. SINAIKO: Excellent. All
12	right. Cosette, could we go back to Page 1,
13	please?
14	BY MR. SINAIKO:
15	Q. Looking at Page 1, do you see there
16	is an entry there that says experience?
17	A. Uh-huh. Yes.
18	Q. Underneath that, it says,
19	Ambassador, Deputy Permanent Observer of the
20	State of Palestine to the United Nations.
21	Do you see that?
22	A. Yes.
23	Q. Underneath that it says, May 2013.
24	Do you see that?
25	A. Yes.

Q. Is it accurate that you currently 1 hold the title Ambassador, Deputy Permanent 2 Observer of the State of Palestine to the 3 United Nations? 4 5 Α. Yes, that is correct. And is it accurate that you have 6 0. 7 held that position at all times since May 2013? Yes, that is correct. A. 8 And who appointed you to that 9 Q. position? 10 11 A. I was promoted to that position by 12 Ambassador Mansour, and it was approved by the President. 13 14 0. When you say "the President," you 15 mean Mr. Abbas? 16 Α. Yes. President Mahmoud Abbas. 17 Q. Okay. Now, on or after January 4 of 2020, have you worked for any organization, 18 other than the Permanent Observer Mission of 19 Palestine to the United Nations? 20 21 No, I have not. A. 22 0. Have you been involved with or have you held -- have you been involved in any other 23 2.4 business entity, other than the Permanent Observer Mission of Palestine to the United 25

1	A. I think her name was Mary Louise
2	Kelly.
3	Q. And was that the is that the
4	let me withdraw and try again.
5	Was that the only time you have been
6	interviewed by a member of the media during
7	2021?
8	A. That is correct.
9	MR. SINAIKO: Bring up Tab 20,
10	please. I would like to mark this as our next
11	exhibit. I think it will be Exhibit 7.
12	THE COURT REPORTER: I must
13	have missed 6, then.
14	MR. SINAIKO: Exhibit 6 was
15	the updated privilege log, I think.
16	(Deposition Exhibit No. 7 was
17	marked for identification.)
18	BY MR. SINAIKO:
19	Q. So this is I will just, for the
20	record, I'll just mention what it is. We are
21	going to mark as Exhibit 7, document titled
22	Palestinian Official Discusses How the UN Can
23	Help End Violence in Israel and Gaza.
24	Do you see that, Ambassador
25	Abdelhady-Nasser?

1	A. Yes, I do.
2	Q. Do you see that that's dated May 19,
3	2021?
4	A. Yes, I do.
5	Q. And, again, if you would like to
6	turn the pages of the thing, I would be happy
7	to do it. Just let us know and Cosette can do
8	that for you.
9	I would like to know whether you
10	agree that this is a transcript of the
11	interview you gave to Mary Louise Kelly, on NPR
12	Radio, on May 19, 2021.
13	MR. BERGER: Let's see the
14	other pages, please.
15	MR. SINAIKO: Certainly. As I
16	said, she is welcome to look at the pages, as
17	many of them as she likes for as long as she
18	likes. I mean, there aren't that many.
19	THE WITNESS: Okay.
20	BY MR. SINAIKO:
21	Q. So are we in agreement that that's
22	an accurate transcription of your interview, on
23	May 19, 2021, with Mary Louise Kelly of
24	National Public Radio?
25	A. Yes, it appears to be so.

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1	Q. And at the time you participated in
2	this interview, where were you located?
3	A. I was at home.
4	Q. And you were participating in this
5	interview because Ambassador Mansour was
6	unavailable; correct?
7	A. Correct.
8	Q. Do you recall why Ambassador Mansour
9	was unavailable?
10	A. He had another engagement that
11	afternoon.
12	Q. Here in New York; correct?
13	A. Correct.
14	Q. And you participated in this
15	interview in your capacity as Deputy Permanent
16	Observer at the Observer Mission; correct?
17	A. Correct.
18	Q.
19	
20	
21	A.
22	
23	
24	Q.
25	

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1 COMMONWEALTH OF PENNSYLVANIA SS 2 COUNTY OF ALLEGHENY 3 CERTIFICATE I, Karen A. Nickel, a notary public in and 4 for the Commonwealth of Pennsylvania, do hereby certify that the witness, FEDA 5 ABDELHADY-NASSER, was by me first duly sworn to testify the truth, the whole truth, and nothing 6 but the truth; that the foregoing deposition 7 was taken at the time and place stated herein; and that the said deposition was recorded stenographically by me and then reduced to 8 typewriting under my direction, and constitutes a true record of the testimony given by said 9 witness. 10 I further certify that I am not a relative, employee or attorney of any of the 11 parties, or a relative or employee of either counsel, and that I am in no way interested 12 directly or indirectly in this action. 13 IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office this 25th 14 day of July 2021. 15 WUA 16 Karen A. Nickel, Notary Public Registered Professional Reporter 17 Certified Realtime Reporter 18 19 20 21 22 2.3 24 25